

8901 '98 NOV 24 P2 37

October 30, 1998

Office of Special Nutritionals
HFS-450 Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
200 C St.SW
Washington DC 20204

Statement of Nutritional Support- PHYTONUTRIENT COMPLEX
Pursuant to 21 CFR Part 101.93, American Specialty Health &
Wellness (ASHW) files the following Statement of Nutritional
Support for the Dietary Supplement marketed as: PHYTONUTRIENT
COMPLEX

- 1) Name and Address of Distributor: ASHW 8989 Rio San Diego Dr. Ste. 250, San Diego CA 92108
- 2) Text of Nutritional Support Statement being Made: "Phytonutrients are plant nutrients that are important for health. The active ingredients from a variety of plants have been extracted and combined in this dietary supplement. The ingredients have been specially chosen to support the functional systems of the body."
- 3) Name of dietary ingredient(s): See Attached Product Label
- 4) Brand Name: PHYTONUTRIENT COMPLEX
- 5) Substantiation information on file at the company office. The corporate officer who can certify same is Dr. Doug Metz, Vice President.

Yours truly,

Dr. Doug Metz

Vice President

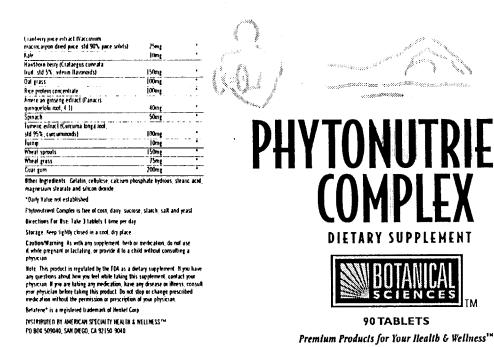
what I

Phytonutrients Complex

Description:

Phytonutrients are plant nutrients that are important for health. The active ingredients from a variety of plants have been extracted and combined in this dietary supplement. The ingredients have been specially chosen to support the functional systems of the body.

These statements have not been evaluated by the Food and Drug Administration (FDA). This product is not intended to diagnose, treat, cure or prevent any disease.



1m;	out Per Serving	R. Barby Fator
Yilamin E (as d'alpha Incopherol succinate)	30 H	[003,
Parsley leaf	50ing	
Fructo oligosaschandes	250mg	•
lumato	50mg	
Milk thistle extract (Silybum marranum seed	-	
std 80% silymarin)	50mg	
Grape seed entract (Vilis vinilera seed.		
std 95% proanthox panidins)	Omg	
Golv kola estract (Centella assatic a whole plant		
sld 10%, triterpenes)	20mg	•
Gingko estract. (Ginkgo bikoba leat.		
sld 24% flavones, 6% terpene lactones)	70mg	·
Excerce root extract (Glycyrchiza uralensis root		
Astragalus extract (Astragalus membrinaceus m		
std 16% astragakisides)	40mg	
Barley sprouts	100mg	
Barley grass	Silme	
Citres biollavonoids	100mg	
Carrot	50mg	
Broccoli	50mg	•
Green lea estract (Camelka sinensis leat		
std 90% polyphenols)	?".mg	•
Garlic, deodorized (Allium sativum bulb)	50mg	
Acerola berry entract (Malpighia glabra berry, 4		
Alfalfa grass	100mg	
Apple pectin	300mg	
Betatene* mixed carotenoids (Dunahelta salina		
whole plant)	img	<u> </u>
Brussel sprouts	50mg	
Cat's claw extract (Uncaria tomentosa bark, 4		
Cauliflower	50mg	
Chlorella (cracked cell)	200mg	